

**Battaglia, Frank**

---

**From:** Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>  
**Sent:** Friday, October 26, 2018 9:27 AM  
**To:** Tisa, Kimberly; Rick Kowalski; Battaglia, Frank  
**Cc:** Joseph F Guarnaccia; Stephen Graham; Aaron Ting; kelly.owens.dem.ri.gov  
**Subject:** RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street, Cranston, RI - Weekly Project Report

Rick,

If water from the trenches and the Frac Tanks has been tested to be below the EPA <0.5 ppb PCB's, you can discharge into one of the upgradient trenches gradually. I would suggest some kind of filter be used to collect any sediment. My previous email and review of the CMI did not have an alternative to the offsite disposal. Keep me informed as you go.

Thank you.

---

**From:** Tisa, Kimberly <Tisa.Kimberly@epa.gov>  
**Sent:** Friday, October 26, 2018 8:19 AM  
**To:** Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>; Rick Kowalski <rkowalski@aeiconsultants.com>; Battaglia, Frank <battaglia.frank@epa.gov>  
**Cc:** Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Aaron Ting <ating@aeiconsultants.com>  
**Subject:** RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street, Cranston, RI - Weekly Project Report

All:

Not sure what water is of issue here, so thought I would respond in context with the federal PCB regulations.

Under the federal PCB regulations at 40 CFR 761.79(b), if water is tested and found to contain < 0.5 ppb PCBs, there are no disposal requirements under TSCA for the water.

*Kimberly N. Tisa, PCB Coordinator*

**USEPA**  
**5 Post Office Square, Suite 100**  
**Boston, MA 02109-3912**

**617.918.1527 (phone)**  
**617.918.0527 (fax)**  
*Tisa.Kimberly@epa.gov*

---

**From:** Crawford, Jeffrey (DEM) [mailto:jeff.crawford@dem.ri.gov]  
**Sent:** Friday, October 26, 2018 7:54 AM  
**To:** Rick Kowalski <rkowalski@aeiconsultants.com>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Battaglia, Frank <battaglia.frank@epa.gov>  
**Cc:** Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Aaron Ting <ating@aeiconsultants.com>  
**Subject:** RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street, Cranston, RI - Weekly Project Report



Rick-

Per your request yesterday, dewatering must follow the CMI 4.2.1.6. The water must be contained, tested and shipped to an approved TSCA facility.

Jeff

---

**From:** Rick Kowalski <rkowalski@aeiconsultants.com>

**Sent:** Thursday, October 25, 2018 3:25 PM

**To:** Tisa, Kimberly <Tisa.Kimberly@epa.gov>; 'Frank Battaglia' <battaglia.frank@epa.gov>; Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>

**Cc:** Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Aaron Ting <ating@aeiconsultants.com>

**Subject:** [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street, Cranston, RI - Weekly Project Report

Dear Kim, Frank and Jeff:

Pursuant to the Corrective Measures Implementation Work Plan (CMI WP) approval dated June 19, 2018, Recordkeeping and Reporting Conditions Section, Item #28, AEI on behalf of BASF is submitting this weekly report to EPA for the week ending 10/19/2018. The following activities have taken place on-Site between 10/15 and 10/19/2018:

- Excavation of approximately 263.4 cubic yards (cy) of PCB-impacted soils. This total included 175.4 cy of soils excavated beyond the limits of the originally planned excavation areas based on post-excavation sampling data (395 cy [11.3%] extra to date). The soils were stockpiled on Lots 1102 and/or 2682 in the temporary soil stockpile areas.
- AEI collected 192 post excavation samples, including QC samples. See attached **Figures 1, 2, 3 and 4** illustrating post-excavation sample locations. The eleven areas that remain to be excavated are highlighted on these figures. Also, see attached **Table 1** for the results of field and lab PCB analyses available to date. Laboratory results pending as of the submittal of this weekly report will be included in the next week's (week ending 10/26) weekly status report.
- Dewatering of five excavations was completed this week. Water from the dewatering of excavations was pumped through bag filters and three carbon vessels to remove PCBs and into frac tanks. A total of 9,600 gallons were pumped. The water was tested for PCBs which indicated a concentration of <0.5 ug/l. Therefore, the water was accepted for disposal at Global Cycle in Taunton, MA. A total of 9,600 gallons of pre-treated water was transported to this facility this week for disposal (total to date to Global is 42,600 gallons).
- Excavations with acceptable post-excavation PCB analytical results were backfilled this week. A total of 92 cy of backfill material was emplaced and compacted. This brings the total amount of backfill material emplaced to 877 cy to date.
- Three rail cars were loaded with TSCA-regulated soils (approximately 90 tons loaded in each car) for transportation to Chemical Waste Management in Emelle, Alabama under hazardous waste manifests. This brings the total to thirty-three rail cars moved off-site (approximately 2,970 tons total) to date.
- Routine soil erosion and sedimentation control inspections are being conducted weekly and following rain events >0.25" of total rainfall in a 24-hour period. Issues noted during these inspections are relayed to SES the same day and corrected within 24-hours.

Dust: Fugitive dust is controlled by SES using water and covering inactive soil stockpiles. Continuous perimeter dust monitoring is performed during all site-related activity including on lot 2682 where the rail cars are loaded. To date, the accumulated data shows that there have been no exceedances of the perimeter dust action level (150 ug/m<sup>3</sup>).

Safety fencing is routinely installed around open excavations deeper than 3 feet at the end of each work day.

To date a total of 5,230 tons (3,169 cy) of PCB-impacted soils have been excavated from the site (approximately **91%** of total anticipated). Overall progress continues to be hampered by subsurface concrete foundations and demolition debris encountered, as well as by returning to excavations to re-dig areas based on post-excavation PCB analytical results. The unusually high amount of rainfall on site has also delayed operations and necessitated more dewatering operations than anticipated.

For any questions, please do not hesitate to call. Thanks,

Richard G. Kowalski, CPG, LSP, CHMM  
Senior Hydrogeologist

**AEI Consultants**  
112 Water Street, 5th Floor  
Boston, MA 02109

c. 508.951.3673

f. 857.233.5531

[www.aeiconsultants.com](http://www.aeiconsultants.com) [[aeiconsultants.com](http://aeiconsultants.com)]